



A PHI Company

**Denise Y. Campbell**  
Manager

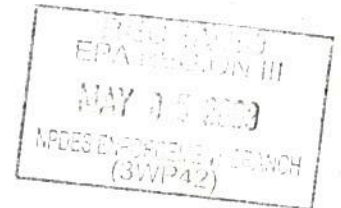
**Environmental Management Services**  
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April 27, 2009

Ms. Angela McFadden (3WP31)  
USEPA Region III  
Enforcement and Compliance  
1650 Arch Street  
Philadelphia, PA 19103-3029



**Re: Benning Generating Station - NPDES Permit No. DC 0000094  
pH Excursion at Monitoring Point 003 (Oil/Water Separator)**

Dear Ms. McFadden:

This letter follows up on our April 22, 2009 telephone notification to report a pH excursion in a water sample collected from a batch discharge to internal monitoring point (MP) 003. The NPDES Permit requires quarterly sampling for pH from MP 003 with limits of between 6.0 to 8.5.

On February 3, 2009, a water sample which was collected from a discharge to MP 003 had a low pH of 4.6. The excursion was discovered on April 21 during the preparation of the quarterly discharge monitoring report for MP 003. Our site investigation which included a thorough review of the operating procedures indicated that the discharge of low pH processed water was an isolated case due to an employee error. There has been no excursion of permit levels in the batch discharges to MP 003 in the past. To prevent a recurrence the following steps were implemented:

- The operating procedure was reviewed with all personnel involved with the oil/water separator operation with emphasis on ensuring compliance with the permit limits prior to a discharge to MP 003.
- A sign showing the permit limits was installed in the vicinity of the discharge switch as a reminder to the operators of the compliance limits.

Please contact me at (202) 331-6640 or Fariba Mahvi at (202) 331-6641 if you need additional information.

Sincerely,

A handwritten signature in cursive script, appearing to read "Denise Campbell".

Denise Campbell  
Manager, Environment Management Services

cc: Ms. Mary Letzkus - EPA Region III  
Ms. Nicoline Shulterbrandt - DCDOE, Water Quality Division

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